

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 24-cr-80007-Middlebrooks/Matthewman

18 U.S.C. § 875(c)

18 U.S.C. § 981(a)(1)(C)

UNITED STATES OF AMERICA

vs.

**MICHAEL SHAPIRO,**

**Defendant.**

INDICTMENT

The Grand Jury charges that:

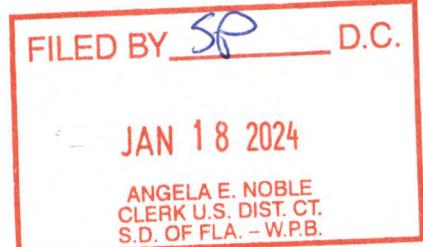
On or about December 19, 2023, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendant,

**MICHAEL SHAPIRO,**

did knowingly transmit in interstate commerce a communication containing any threat to injure the person of another, that is, Victim 1, in that in a recorded voicemail left for Victim 1, he stated in part, "Hey mother-[expletive], you [expletive] a Chinese spy. You mother-[expletive], I'm gonna come after you and kill you [expletive]" and "Hey greaseball, you [expletive] a [expletive] Chinese spy. Fang Fang. Fang Fang. I'm gonna come and kill your children you mother-[expletive]. I'm gonna kill your children," with the intent to communicate a threat and with the knowledge that it would be viewed as a threat, in violation of Title 18, United States Code, Section 875(c).

FORFEITURE ALLEGATIONS

1. The allegations of this Indictment are hereby re-alleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America of certain property in which the defendant, **MICHAEL SHAPIRO**, has an interest.



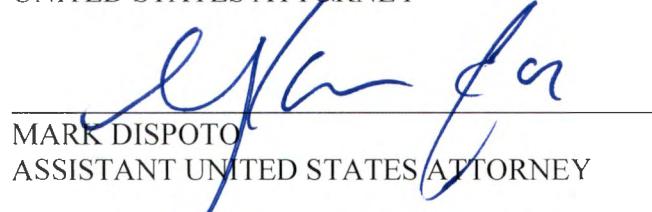
2. Upon conviction of a violation of Title 18, United States Code, Section 875(c), as alleged in this Indictment, the defendant shall forfeit to the United States any property, real or personal, which constitutes or is derived from proceeds traceable to such offense, pursuant to Title 18, United States Code, Section 981(a)(1)(C).

All pursuant to Title 18, United States Code, Section 981(a)(1)(C) and the procedures set forth in Title 21, United States Code, Section 853, as incorporated by Title 28, United States Code, Section 2461(c).

A TRUE BILL.

 FOREPERSON

  
MARKENZY LAPOINTE  
UNITED STATES ATTORNEY

  
MARK DISPOTO  
ASSISTANT UNITED STATES ATTORNEY

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

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CASE NO.: 24-cr-80007-Middlebrooks/Matthewman

V.

MICHAEL SHAPIRO,

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Defendant. /

**Court Division** (select one)

Miami       Key West       FTP  
 FTL       WPB

## CERTIFICATE OF TRIAL ATTORNEY

### **Superseding Case Information:**

New Defendant(s) (Yes or No)

### Number of New Defendants

Total number of counts

I do hereby certify that:

1. I have carefully considered the allegations of the indictment, the number of defendants, the number of probable witnesses and the legal complexities of the Indictment/Information attached hereto.
2. I am aware that the information supplied on this statement will be relied upon by the Judges of this Court in setting their calendars and scheduling criminal trials under the mandate of the Speedy Trial Act, Title 28 U.S.C. §3161.
3. Interpreter: (Yes or No) No \_\_\_\_\_  
List language and/or dialect: \_\_\_\_\_
4. This case will take 1-2 days for the parties to try.
5. Please check appropriate category and type of offense listed below:  
(Check only one) (Check only one)  
I  0 to 5 days  Petty  
II  6 to 10 days  Minor  
III  11 to 20 days  Misdemeanor  
IV  21 to 60 days  Felony  
V  61 days and over
6. Has this case been previously filed in this District Court? (Yes or No) No  
If yes, Judge \_\_\_\_\_ Case No. \_\_\_\_\_
7. Has a complaint been filed in this matter? (Yes or No) Yes  
If yes, Magistrate Case No. 23-mj-8623
8. Does this case relate to a previously filed matter in this District Court? (Yes or No) No  
If yes, Judge \_\_\_\_\_ Case No. \_\_\_\_\_
9. Defendant(s) in federal custody as of Released on bond
10. Defendant(s) in state custody as of \_\_\_\_\_
11. Rule 20 from the \_\_\_\_\_ District of \_\_\_\_\_
12. Is this a potential death penalty case? (Yes or No) No
13. Does this case originate from a matter pending in the Northern Region of the U.S. Attorney's Office prior to August 8, 2014 (Mag. Judge Shaniek Maynard? (Yes or No) No
14. Does this case originate from a matter pending in the Central Region of the U.S. Attorney's Office prior to October 3, 2019 (Mag. Judge Jared Strauss? (Yes or No) No
15. Did this matter involve the participation of or consultation with now Magistrate Judge Eduardo I. Sanchez during his tenure at the U.S. Attorney's Office, which concluded on January 22, 2023? No

By: Mark Dispoto  
MARK DISPOTO  
Assistant United States Attorney  
Court ID No. A5501143

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

24-cr-80007-Middlebrooks/Matthewman

Defendant's Name: MICHAEL SHAPIRO

Making a Communication in Interstate Commerce that Contained a Threat to Injure

Title 18, United States Code, Section 875(c)

\*Max. Penalty: 5 years' imprisonment; 3 years supervised release; \$250,000 fine

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\*Refers only to possible term of incarceration, supervised release and fine. It does not include possible restitution, special assessments, parole terms, or forfeitures that may be applicable.